The A2 Label Controversy, Explained: What FSSAI's 2024 Ruling Actually Means for Indian Ghee Buyers (Full Timeline)

Executive Summary

In August 2024, India's food regulator briefly ordered businesses to stop labelling milk and milk products - including ghee - as "A1" or "A2," calling such claims non-compliant with existing food law. Five days later, it withdrew the order "for further consultation with stakeholders." The episode was widely misreported as an "A2 ban," and the whiplash left buyers more confused than before. This article reconstructs exactly what happened, why, and what it means in practice. The short version: FSSAI did not declare A2 fake; it flagged that **no legal standard currently defines or certifies "A2," so the label can't be treated as a regulated guarantee.** The biochemistry behind A2 is real and supported by modest clinical evidence; the open question is substantiation. For buyers, the practical takeaway is to judge an A2 claim by breed, method, and testing - not by the word on the jar.

Introduction: Why This Topic Matters Now

If you've researched A2 ghee in the last two years, you've probably encountered conflicting headlines: "FSSAI bans A2 milk" sitting next to "FSSAI withdraws A2 ban." Both refer to the same five-day window in August 2024, and neither headline is fully accurate. For a category sold almost entirely on trust - purity, breed, tradition - this regulatory ambiguity is corrosive. Skeptical buyers reasonably ask: *if the regulator questioned the label, is the whole thing a gimmick?*

That question deserves a straight answer rather than marketing spin. This explainer lays out the timeline from primary documents, separates what the **regulation** says from what the **science** shows, and gives you a practical method to evaluate any A2 claim.

Background and Context: What "A2" Actually Refers To

"A1" and "A2" describe two variants of beta-casein, the main protein in cow's milk, differing by a single amino acid at position 67. During digestion, the **A1 variant can release a peptide called beta-casomorphin-7 (BCM-7); the A2 variant does not** [PMC; Journal of Nutrition]. Indigenous Indian (desi) breeds predominantly carry the A2 genotype, while many high-yield exotic and crossbred cows carry A1 - which is the biological basis for the premium placed on desi-cow A2 products.

So "A2" is not a marketing invention; it is a genuine genetic and biochemical attribute. The contested part is what that attribute *does* for health, and whether a product labelled "A2" has actually been verified as such.

Current State: The Regulation vs the Science

Two separate questions get tangled in the A2 debate, and keeping them apart is the key to the whole controversy.

The regulatory question - does Indian food law recognise "A2"? As of the 2024 episode, **no FSSAI standard defines, tests for, or certifies "A1" or "A2" milk.** FSSAI's position was that, because these categories aren't recognised under the Food Safety and Standards Act, 2006, marketing products specifically as "A2" was not in conformance with the law [FSSAI advisory; TaxTMI]. This is a *labelling-substantiation* objection, not a finding that A2 is fraudulent.

The scientific question - is A2 milk actually easier to digest? Here the peer-reviewed evidence is real but measured. Multiple randomized trials report **fewer gastrointestinal symptoms with A2-only milk** compared to conventional A1/A2 milk - for example, a randomized study in Chinese children found improved stool consistency and reduced GI discomfort on A2-only milk [Nutrition Journal; PMC]. However, the same literature is careful to note that the **evidence does not establish a causal link between A1 milk and systemic or neurological disease in healthy adults**, and several trials are small or pilot-scale [Journal of Nutrition review]. The honest scientific summary: A2 shows a modest, repeatable digestive-comfort benefit for some people, not a miracle.

Data-Backed Analysis: The Five-Day Timeline

The controversy itself unfolded with unusual speed:

Visual 1 - Timeline graphic:

Date	Event
2019–2024	Rapid growth of "A2" branding across milk, ghee, butter, and curd; premium pricing on desi-cow products.
21 Aug 2024	FSSAI issues an advisory directing all Food Business Operators - including e-commerce platforms - to remove A1/A2 claims, citing non-conformance with the FSS Act, 2006 [Business Standard].
22–25 Aug 2024	Industry backlash from A2-focused producers and farmer groups arguing the move erased a legitimate, premium category.
26 Aug 2024	FSSAI withdraws the advisory "for further consultation with stakeholders" - five days after issuing it [Business Standard; Moneylife].
2024 → present	A2 labelling continues while the consultation remains unresolved; no formal A2 standard has yet been notified.

The reversal is what makes this a *consultation* story rather than a *ban* story. FSSAI didn't conclude A2 was illegitimate - it paused an enforcement action it hadn't socialised with the industry.

Key Findings

1. **There was no "A2 ban."** The 21 Aug advisory targeted the *label claim*, applied for five days, and was withdrawn on 26 Aug 2024 [Business Standard].
2. **No legal A2 standard exists (yet).** The objection was that "A2" isn't defined under the FSS Act, 2006 - making the label unregulated, not fraudulent [FSSAI; TaxTMI].
3. **The science is real but modest.** A2-only milk shows repeatable digestive-comfort benefits in trials; broader disease claims are not established [Journal of Nutrition; Nutrition Journal].
4. **Substantiation is the real issue.** Because no certification exists, the burden falls on the producer to prove A2 status through breed and genotype/protein testing.
5. **Honesty is now a competitive edge.** In a confused market, the brand that explains this clearly earns disproportionate trust.

What Marketing Says vs What Regulation Permits vs What Science Supports

Visual 2 - Comparison matrix:

Statement	Marketing often claims	What FSSAI currently permits	What peer-reviewed science supports
"A2 is a defined, certified category"	Implied	**No** - no FSSAI A2 standard exists	N/A (regulatory, not scientific)
"A2 milk causes no BCM-7 on digestion"	Yes	Claim allowed only if substantiated	**Yes** - biochemically established
"A2 is easier to digest for some"	Yes	Allowed if substantiated	**Yes, modestly** - multiple RCTs
"A2 prevents major diseases"	Sometimes	Not permitted without proof	**Not established**

Practical Implications: How to Verify a Genuine A2 Claim

Because the label alone isn't a regulated guarantee, evaluate the *substantiation* behind it:

Visual 4 - Verification flowchart:

1. **Breed** - Is the product from a named indigenous/desi breed known to carry the A2 genotype (e.g., Kangeyam, Gir, Sahiwal)? Vague "desi cow" with no breed is a yellow flag.
2. **Evidence of A2 status** - Does the producer reference herd genotype testing or A2 protein verification, rather than just asserting "A2"?

3. **Method transparency** - Is the production method (e.g., Bilona) and sourcing disclosed?
4. **Lab reports** - Are FSSAI/NABL test results for the *ghee itself* available (purity, composition)?
5. **Price sanity** - Does the price clear the genuine production floor for A2 ghee? (A sub-cost price undercuts any premium claim.)

A brand that answers all five is making a substantiated claim - exactly the standard FSSAI's objection implied should exist.

Historical Context and Market Evolution

The A2 premium grew faster than the regulatory framework around it - a common pattern when a science-led attribute becomes a marketing category before standards catch up. The 2024 advisory was, in effect, the regulator signalling that the framework needs to catch up. Internationally, the A2 concept has been commercialised for two decades, but India's combination of indigenous-breed heritage and rapid D2C growth makes substantiation uniquely important here. Capturing brand pages from this period via web archives shows how quickly the market adapted around the five-day window - useful documentation for researchers studying food-labelling governance.

Future Outlook

The most likely trajectory is **formalisation, not prohibition**: FSSAI's "further consultation" language points toward eventually defining substantiation requirements (breed/genotype evidence, testing) rather than erasing the category. For producers, the strategic implication is clear - the brands that *pre-comply* by publishing breed, testing, and method data will be insulated from whatever standard emerges. For buyers, expect the word "A2" to mean less over time and the *evidence* behind it to mean more.

Expert Interpretation / Strategic Commentary

The cleanest way to read the 2024 episode is that FSSAI raised the right question at the wrong speed. The question - "can you prove this claim?" - is legitimate and pro-consumer. The five-day reversal showed the regulator hadn't yet built the consultation and testing infrastructure to enforce it. For the industry, that gap is an opportunity: substantiation is currently *voluntary*, which means brands can lead on it before it becomes mandatory. In trust-driven categories, voluntary transparency ahead of regulation is one of the most durable competitive moats available.

Conclusion

FSSAI did not ban A2 milk or ghee. In August 2024 it briefly challenged the *unregulated use of the A2 label*, then withdrew the order for consultation - leaving the category legal but, as yet, without a formal standard. The underlying biochemistry of A2 is genuine, and the digestive-comfort evidence is real if modest. What's missing is certification, which shifts the responsibility onto producers to substantiate their claims. For buyers, that reframes the whole question: don't ask whether "A2" is real - ask whether *this* product has proven it is. The label is a starting point; the evidence is the answer.

Full Citation List (with URLs)

1. **Business Standard - FSSAI withdraws advisory on A1/A2 milk claims** (advisory issued 21 Aug, withdrawn 26 Aug 2024) - https://www.business-standard.com/india-news/fssai-withdraws-advisory-on-removal-of-claims-of-a1-a2-types-of-milk-124082600852_1.html
2. **Business Standard - Decoded: FSSAI's U-turn on the week-old A1/A2 notice** (context, e-commerce scope) - https://www.business-standard.com/industry/news/decoded-fssai-takes-u-turn-on-week-old-notice-on-a1-a2-milk-products-124082700652_1.html
3. **Moneylife - FSSAI Withdraws Advisory on A2 Milk within 5 Days** (timeline corroboration) - https://www.moneylife.in/article/fssai-withdraws-advisory-on-a2-milk-products-within-5-days/74999.html
4. **Slurrp - FSSAI Withdraws Advisory on A1/A2 Claims; Here's Why** (reason: further consultation) - https://www.slurrp.com/article/fssai-withdraws-recent-advisory-on-a1-and-a2-milk-claims-heres-why-1724817901083
5. **TaxTMI - FSSAI Guidelines on A1/A2 Cow's Milk and Ghee** (legal basis, FSS Act 2006 non-conformance, no A2 standard) - https://www.taxtmi.com/article/detailed?id=14365
6. **Down To Earth - FSSAI calls A2 labelling a "misleading marketing gimmick"** (regulatory framing) - https://www.downtoearth.org.in/food/misleading-marketing-gimmick-fssai-announces-curbs-on-dairy-products-from-being-labelled-as-a2
7. **The Journal of Nutrition (2022) - A2 β-casein: Myth or Reality? review** (scientific scope and limitations) - https://jn.nutrition.org/article/S0022-3166(22)00140-7/fulltext
8. **Nutrition Journal / Springer (2016) - A2-only vs A1/A2 milk on GI physiology** (RCT evidence of digestive benefit) - https://link.springer.com/article/10.1186/s12937-016-0147-z
9. **PMC - Milk proteins and human health: the A1/A2 hypothesis** (BCM-7 mechanism) - https://pmc.ncbi.nlm.nih.gov/articles/PMC3475924/
10. **PMC - A2 milk vs conventional milk on digestion in Chinese children (RCT)** (symptom and stool outcomes) - https://pmc.ncbi.nlm.nih.gov/articles/PMC6727941/
11. **FSSAI - Milk Product Survey 2020 (PDF)** (national milk/product quality baseline) - https://fssai.gov.in/upload/uploadfiles/files/Report_of.pdf
12. **FSSAI - Chapter 2.1 Standards for Milk and Milk Products (PDF)** (no A2 category; ghee composition) - https://www.fssai.gov.in/upload/uploadfiles/files/Chapter%202_1%20(Dairy%20products%20and%20analogues).pdf

7. Citation Notes by Section

- **Timeline / regulatory facts:** sources 1, 2, 3, 4, 5 (dates, scope, withdrawal reason).
- **"Misleading gimmick" framing:** source 6.
- **A2 biochemistry (BCM-7):** sources 7, 9.
- **Clinical digestive evidence + limitations:** sources 7, 8, 10.

- **No legal A2 standard:** sources 5, 12.
- **Market/quality baseline:** source 11.